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## PINELLAS COUNTY, FLORIDA EMERGENCY COMMUNICATIONS

APR 0 3 2001

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March 27, 2001

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The Honorable Michael K. Powell Chairman Federal Communications Commission 445 12<sup>th</sup> Street, SW Washington, DC 20554

RE: WT Docket No. 00-32

Dear Mr. Chairman,

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I am writing you on behalf of Pinellas County, Florida, Emergency Communications Department to express our concern about the FCC's intension to auction 50 MHz of spectrum in the 4940-4990 MHz (4.9 GHz) band, rather than allocating this critically needed spectrum to public safety for new broadband public safety applications.

Pinellas County covers approximately 280 square miles, and serves a population of over 902,000 people, and over 4.4 million visitors per year. Pinellas County Public Safety agencies include 22 Fire Departments, 16 Police Agencies, 911, EMS services, and associated agencies, with approximately 7000 users on the current radio system. These Public Safety agencies rely on State of the Art equipment to carry out their duties. Pinellas County continues to face interference issues, with multitudes of wireless carriers in this metropolitan area. The lack of spectrum allocated to Public Safety will only further hamper the implementation of future technologies, and our ability to serve the citizens of Pinellas County. Pinellas County, Emergency Communications Department is responsible for all Public Safety communications and the 911 system for Pinellas County.

Public Safety identified the need for 95 MHz of additional spectrum in 1996; to meet our communications needs over the next ten years. Of this amount, the greatest need will be for advanced wideband and broadband technologies. To date, the FCC has allocated 24 MHz to public safety users in the new 746 MHz band, which is not compatible for implementation in all areas. There are new emerging broadband technologies and applications appearing on the horizon that will require significantly wider bandwidths, so we continue to seek additional allocation for Public Safety.

This technology will allow Pinellas County Law Enforcement agencies to implement the wideband technologies; including image and video cameras and viewers, mobile data terminals and all their peripheral devices, palmtops, wireless long range headsets, microphones, earpieces, and voice recognition to allow complete hands free operation. We feel that this type of equipment will provide a safer environment for our police officers. This same technology will allow wireless uploads of videos, images, and reports from the police vehicle to the communications center or command vehicle. Through the WLAN technology the communications centers would be able to provide full motion video monitoring for remote controlled operations, and monitoring of officers or suspects in high risk situations, allowing for on scene decision making and assistance based on video transmissions.

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This Technology would also benefit Fire and EMS agencies using personal area networks (PAN) to wirelessly integrate a variety of lifesaving tools into the firefighter's suit and helmet. Some of the benefits include biometrics and environmental sensors, 3D location, video and thermal imaging cameras, wireless microphones and earpieces, and voice recognition to allow complete hands-free and wire-free operation of all communications. The availability of high speed wireless data links transmit this vital information to fire incident command for constant monitoring of the location and vital signs of all firefighters would help provide a safe environment of the Fire and EMS personnel. These technologies could also provide a critical link for quickly locating disoriented or downed firefighters before fatal injuries occur. Fire agencies would also benefit from the ability to access maps, images, and blueprint files pertaining to structures within Pinellas County, through the Wireless Local Area Networks (WLAN).

Although unlicensed consumer oriented broadband technologies are on the horizon in the nearby 5 GHz band, Public Safety agencies cannot rely on unlicensed spectrum for our mission critical applications. We must have dedicated spectrum and systems that assure the safety of our personnel via immediate priority access, uninterrupted transmissions, and guaranteed coverage and reliability. The proximity of this unlicensed band to the proposed public safety 4.9 GHz allocation allows us to leverage such standards based broadband technologies and yet have the dedicated, reliable, secure and enhanced featured broadband solutions that we require for our mission critical applications.

Pinellas County Emergency Communications Department, on behalf of over 40 Public Safety agencies in Pinellas County, urges you and the Commission to recognize our broadband spectrum needs and allocate this much needed 4.9 GHz band to the public safety community. Obtaining this spectrum is a critical step for public safety agencies such as ours to access these new advanced broadband solutions for our mission critical applications.

Sincerely,

Pamela J. Montanari, Radio Systems Manager Department of Emergency Communications

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Copy to:

Office of the Secretary Ms. Magalie Roman Sallas 445 12<sup>th</sup> Street, SW Washington, DC 20554